

Massachusetts Substation

City of Seattle Response to Request for Information Regarding the Harbor Island Superfund Site, East Waterway Operating Unit

D. QUESTIONS

1. Identification and Association with Subject Property

- a. Provide the full legal name and mailing address of Respondent.

City of Seattle
c/o William Devereaux
Director, Environmental Management and Real Estate Division
Seattle City Light
700 5th Avenue, Suite 3316
P.O. Box 34023
Seattle, Washington 98124-4023

- b. For each person answering these questions on behalf of Respondent, provide that person's:

- i. full name;
- ii. title;
- iii. business address and electronic mail address; and
- iv. business telephone number.

Jo Bruskotter
Senior Paralegal, Environmental Section
Seattle City Attorney's Office
701 5th Avenue, Suite 2050
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206-233-2152

- c. If Respondent wishes to designate an individual for receiving future correspondence from the EPA concerning the EWOU, please indicate so here by providing that individual's name, mailing address, electronic mail address, telephone number, and fax number.

Pete Rude
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- d. Provide the address of each Subject Property, the time period when Respondent held any ownership or other interest in the Subject Property, and the type of interest held.

Massachusetts Receiving Substation is located at 1555 Utah Avenue South. The City acquired the subject property as an active unit substation from Puget Sound Power & Light in 1951¹ and has operated either a unit or receiving substation at the site from 1951 to the present.

- e. Identify all materials used or created by Respondent's activities or operations at each Subject Property.

No materials are created at Massachusetts Substation. Oil encased in electrical equipment is the principal material at the site. Materials used are discussed in the responses to 1.h, 1.l and 1.m.

- f. Provide copies of all documents regarding the ownership or environmental conditions of the Subject Property, including, but not limited to, deeds, sales contracts, leases, surveys, investigations, sampling, reports, blueprints, "as-builts," and photographs.

Responsive documents have been produced and indexed.

- g. Provide information on the condition of the Subject Property when purchased or at the beginning of the relevant time period; describe the source, volume, and content of any fill used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.

When it was acquired in 1951, Massachusetts Substation comprised electrical equipment on a concrete pad and on steel racks, a substation building, a garage and storage shed, an office and storage building, and a condenser house.² See the response to h.i and h.ii for information on site operations prior to the City's acquisition of the property.

The property is not adjacent to water and contains no waterside structures.

No records regarding fill placed on the subject property have been located, but the property may contain fill from historical dredging of the East Waterway.

- h. Describe the activities or operations at each Subject Property including:
i. the date such activities or operations commenced and concluded; and

See the response to h.ii. below.

¹ SEA EWW_00012174, at SEA EWW_00012188 (15), PSPL Deed and Bill of Sale, 1951.

² SEA EWW_00011541, Industrial substation contract plan, 1952.

- ii. the types of activities or operations performed at each Subject Property, including but not limited to the use, storage, or disposal of any materials in an outdoor location.

Operations

1902 to at least 1918: Seattle Electric Co.³ purchased portions of the site in 1902 and 1904.⁴ A 1918 Puget Sound Traction, Light & Power plan shows multiple rail tracks entering the property, along with either proposed or existing structures including a freight shed and platform.⁵ The plan identifies the property as a freight shed and substation.⁶

At least 1926-1951: Puget Sound Power & Light operated a substation at the site.⁷ A 1926 plan of the property shows outdoor electrical equipment, a substation house, condenser building, cooling tower, workshop, freight shed, and oil house.⁸ Several rail tracks enter the site from Utah Avenue.⁹ 1936 and 1948 photos show active substation equipment on the property.¹⁰

1951-1969: The City acquired Massachusetts Substation in 1951 as part of its purchase of Puget Sound Power & Light assets within the Seattle city limits.¹¹ From 1951 to 1969, the City operated a unit and/or an industrial substation at the site.¹²

1952 plans for the “Massachusetts Industrial Substation” show a substation building, equipment racks, electrical ducts, a condenser house, storage buildings, and a capacitor pad.¹³ The plans call for installation of new ducts, duct extensions, and gravel fill.¹⁴

³ Seattle Electric Co., Puget Sound Traction, Light & Power Co., and Puget Sound Power & Light are all predecessors of Puget Sound Energy (PSE). See PSE’s website at [PSE | Our History and Timeline](#) and HistoryLink.org at [Georgetown Steam Plant \(Seattle\) - HistoryLink.org](#).

⁴ SEA EWW_00012096, Substation property plan, 1926.

⁵ SEA EWW_00009835, PSTLP Massachusetts St. Land Plan, 1918.

⁶ SEA EWW_00009835, PSTLP Massachusetts St. Land Plan, 1918.

⁷ SEA EWW_00012096, Substation property plan, 1926; SEA EWW_00011300, King County Parcel Viewer basemap, 1936; SEA EWW_00010392, PSPL Substation photo, 1948; SEA EWW_00012174 at SEA EWW_00012188 (15), PSPL Deed and Bill of Sale, 1951.

⁸ SEA EWW_00012096, Substation property plan, 1926.

⁹ SEA EWW_00012096, Substation property plan, 1926.

¹⁰ SEA EWW_00011300, King County Parcel Viewer Basemap, 1936; SEA EWW_00010391 and SEA EWW_00010392, PSPL Substation photos, 1948.

¹¹ SEA EWW_00012174 at SEA EWW_00012179, 188 (4, 15), PSPL Deed and Bill of Sale, 1951.

¹² Unit substations convert or “step down” electrical distribution voltages to operational voltages. Industrial substations distribute power to dedicated customers.

¹³ SEA EWW_00011541, Contract Plan, 1952; SEA EWW_00012499, Contract Plan for Unit Sub Duct Runs, 1952.

¹⁴ Contract Plan, 1952; SEA EWW_00012499, Contract Plan for Unit Sub Duct Runs, 1952.

In 1956 and 1962, Massachusetts substation is listed in City Light reports as both an attended distribution and an industrial substation.¹⁵ From 1965 to 1968 it is identified only as an industrial substation.¹⁶ Plans and reports show that the substation was remodeled and enlarged in 1968-1969, while continuing to operate as an industrial substation.¹⁷

1969-1979: The receiving substation began operating in late 1969.¹⁸ A 1971 City Light report describes Massachusetts Substation as an “automatic receiving and distribution substation, non-attended” that began carrying its current load in October 1969.¹⁹ Equipment included two transformer banks, circuit breakers, and eight capacitor banks.²⁰ The substation also carried two 230kV transmission lines.²¹ A 1968 Plot Plan and 1969 photos show a fenced substation with a gravel equipment yard and small control building.²² The 1971 report states that the Massachusetts unit substation was disconnected and removed that year.²³

An overhead transmission cable terminus was installed at Massachusetts Substation in 1972. Specifications, plans, and drawings for the terminus call out a 115 kV oil-filled cable and two oil reservoirs.²⁴ By 1978, substation equipment included six transmission lines along with the two transformer and eight capacitor banks.²⁵

1980s: In 1982 Massachusetts Substation was an unattended receiving and transmission substation.²⁶ Equipment included three power transformers, eight capacitor banks, and six transmission lines.²⁷ Capacitors at the substation contained PCBs.²⁸ A 1982 plan for a station capacity addition shows new foundations for

¹⁵ SEA713195, at SEA713204 (10), Information on City Light Installations, 1956; SEA713207, at SEA713239 (33), SCL 1962 Power System Information report.

¹⁶ SEA EWW_00008852, at SEA EWW_00008918 (67), 1965 Power System Information report; SEA EWW_00009666, at SEA EWW_00009736 (71), 1968 Power System Information report.

¹⁷ SEA EWW_00009666, at SEA EWW_00009736, 765 (71, 100) 1968 Power System Information report; SEA EWW_00010872, Plot Plan, 1968; SEA EWW_00011518, Control Bldg & Cable Trenches Plan, 1968.

¹⁸ SEA EWW_00010394, Seattle Times article re testing new receiving substation, 1969.

¹⁹ SEA713490, at SEA713524 (35), SCL 1971 Power System Information report.

²⁰ SEA713490, at SEA713510, 524 (21, 35), SCL 1971 Power System Information report.

²¹ SEA713490, at SEA713506, 524 (17, 35), SCL 1971 Power System Information report.

²² SEA EWW_00010872, Plot Plan, 1968; SEA EWW_00010256, 190188 Mass Sub photo, 1969; SEA EWW_00010361, 190558 Mass Sub aerial, est. 1973-1977; SEA EWW_00009836, 123751 Mass Sub photo, 1969; SEA EWW_00009837, 123781 Mass Sub photo, not dated.

²³ SEA713490, at SEA713509, 524 (20, 35), SCL 1971 Power System Information report.

²⁴ SEA320562-all, Specifications for Oil-filled Cable & Accessories, 1971; SEA320439, at SEA320441 (3), planned arrangements for oil-filled cable termination, 1972.

²⁵ SEA EWW_00008944, at SEA EWW_00008944_0066, (67), 1978 Power System Information report.

²⁶ SEA713673, at SEA713712 (40), 1982 Power System Information report.

²⁷ SEA713673, at SEA713712 (40), 1982 Power System Information report; SEA713741, at SEA713786 (46), 1985 Power System Information Report.

²⁸ SEA713673, at SEA713683 (11), 1982 Power System Information report; SEA713741, at SEA713757 (17), 1985 Power System Information Report.

capacitor and transformer banks and additions to the control building and switchgear building.²⁹

1990s: Equipment identified in 1990 and 1998 reports includes circuit breakers, six overhead transmission lines, three power transformers, and 10 to 12 capacitor banks (non-PCB per the 1998 report).³⁰

2000-present: The 2000 Spill Prevention Control & Countermeasure Plan (SPCC Plan) lists equipment and structures including three step-down transformers, smaller transformers, capacitors, compressors, two cable pumphouses, a generator, a control house and a switchgear building.³¹ The switchgear building contains a shop.³² Later reports state that substation equipment includes three transformer banks (step-down or power transformers), twelve capacitor banks, cable pump houses and terminals, and six transmission lines.³³

Oil Handling

Loading and unloading of oil happens infrequently at Massachusetts Substation.³⁴ At times, equipment oil is filtered using a truck-mounted system on site.³⁵ When needed, insulating or diesel oil is delivered to the substation by tanker truck.³⁶ Oil taken from equipment for maintenance is removed from the site and disposed of through City Light's South Service Center.³⁷ Historically, if a capacitor leaked or failed, it was removed from service and transported for disposal in a sealed container.³⁸

- i. Describe each release of materials at or from a Subject Property, including the type and quantity of the materials, the location of the release, the impacted media, and the response.

Following is a list of known releases at Massachusetts Substation logged in City Light release records. The release records date back to April 1984.³⁹

²⁹ SEA EWW_00011539, Massachusetts Bank 17 Station Capacity Addition plan, 1982.

³⁰ SEA713812, at SEA713846 (35), 1998 Power System Information report; SEA713876, at SEA713914 (39), 1990 Power System Information report.

³¹ SEA EWW_00011374, at SEA EWW_00011378, 389 (5, 16), Massachusetts Sub SPCC Plan, 2000.

³² SEA EWW_00011374, at SEA EWW_00011391 (18), Massachusetts Sub SPCC Plan, 2000.

³³ SEA EWW_00009037, at SEA EWW_00009113 (77), 2004 Power System Information report; SEA EWW_00011413, at SEA EWW_00011426 (14), Massachusetts Sub SPCC Plan, 2010; SEA EWW_00011321, at SEA EWW_00011346 (26), Massachusetts Sub SPCC Plan, 2020.

³⁴ SEA EWW_00011321, at SEA EWW_00011351 (31), Massachusetts Sub SPCC Plan, 2020.

³⁵ SEA EWW_00011321, at SEA EWW_00011351 (31), Massachusetts Sub SPCC Plan, 2020.

³⁶ SEA EWW_00011321, at SEA EWW_00011351 (31), Massachusetts Sub SPCC Plan, 2020.

³⁷ SEA EWW_00019188, at SEA EWW_00019228 (41), Klopstad deposition, 2008.

³⁸ SEA EWW_00019079, at SEA EWW_00019081 (3), Correspondence re handling of Askarels, 1976.

³⁹ Pers. Comm. w/E. Tremaglio, 10/20/2021.

1/21/1991: A grounding transformer ruptured when a weld failed, and 40 to 50 gallons of oil “sprayed concrete, steel, cables, and gravel/soil within an 1,800 square foot radius” at the substation.⁴⁰ Testing of a sample of the spilled oil returned 402 ppm PCBs.⁴¹ EPA was notified of the release.⁴²

Seattle City Light personnel used a “penetone triple wash/rinse” to clean the cables and transformer bank that had been sprayed with oil.⁴³ Subsequently, seven wipe samples were collected from the cleaned surfaces.⁴⁴ Sample testing returned between <0.01 and 2.70 ppm PCBs.⁴⁵ A second sample was taken from the ruptured transformer when it was removed on 1/28/1991, but analysis of that sample has not been located in City records.⁴⁶

Olympus Environmental was contracted to clean the remainder of the release site.⁴⁷ The cleanup plan included removal of approximately 30 cubic yards of soil, further cleaning of impacted equipment surfaces, and post-cleanup testing and analysis.⁴⁸ Soil was excavated to depths of six to 30 inches, until field sampling showed PCBs at or below 1 ppm.⁴⁹ Contaminated soil, gravel and debris from the cleanup was sent out for disposal in March 1991.⁵⁰ The highest PCB sample result for the contents of the disposal was 404 ppm.⁵¹

6/10/2006: “[Capacitor Breaker] 13-533 leaked oil onto concrete pad. Rush sample taken to lab, no PCBs detected. Absorbent pads, loose absorbent, socks put out on and around pad. Stations crew to clean up when equipment is fixed.” Reporting of this release was not required.⁵²

8/19/2008: “Oil switch for breaker failed (Capacitor breaker), oil capacity ~20 gallons. One gallon or less of oil has leaked onto concrete pad; if leak continues it will reach gravel and soil. Oil switch must be fixed - needed for power. Leak to be fixed and oil refilled. Switch marked <5 ppm PCBs. No sample date or number. Oil sample taken to lab. Stations will perform cleanup unless PCBs are detected, then will require assistance from Civil. No PCBs. KD gave cleanup instructions to P. Schroeder. Will begin cleanup 8/21/08 once electrical work is completed. Crew using PPE, visqueen, absorbents to

⁴⁰ SEA150574, at SEA150574 (1), Combined release and cleanup report, 1991; SEA150579, at SEA150582 (4), Raven report re SCL Work Order 91-7, 1991.

⁴¹ SEA150603, at SEA150603 (1), Spill chronology, 1991.

⁴² SEA150603, at SEA150603 (1), Spill chronology, 1991.

⁴³ SEA150579, at SEA150582 (4), Raven report re SCL Work Order 91-7, 1991.

⁴⁴ SEA150579, at SEA150582 (4), Raven report re SCL Work Order 91-7, 1991.

⁴⁵ SEA150579, at SEA150587-588 (9-10), Raven report re SCL Work Order 91-7, 1991.

⁴⁶ SEA150603, at SEA150604 (2), Spill chronology, 1991.

⁴⁷ SEA150603, at SEA150604 (2), Spill chronology, 1991.

⁴⁸ SEA150596, at SEA150597 (2), Olympus work plan, 1991.

⁴⁹ SEA150574, at SEA150575 (2), Combined release and cleanup report, 1991.

⁵⁰ SEA EWW_00012260, at SEA EWW_00012268 (9), SCL 1992 PCB Annual Document.

⁵¹ SEA EWW_00012260, at SEA EWW_00012268 (9), SCL 1992 PCB Annual Document.

⁵² SEA EWW_00012273, at SEA EWW_00012417 (145), SCL Hazardous Material Incident report, 2021.

contain oil and protect workers. Will clean pad with absorbents and Ecomate.” Reporting was not required.⁵³

11/14/2008: “Oil switch for breaker failed (Capacitor breaker), oil capacity ~20 gallons. One gallon or less of oil has leaked onto concrete pad, gravel and soil. Per J. Emunson, according to Wong Wu, breaker has been leaking for at least two months, maybe longer. Visqueen placed over spill area. Civil will perform cleanup. No PCBs. Spill from same piece of equipment 8/19/2008.” Reporting was not required.⁵⁴

12/1/2011: “Several capacitor fuses blew. One of the capacitor cans burst at the bottom and leaked oil to the gravel and the case. The contaminated soil and gravel was dug up and placed in a drum.” Reporting was not required.⁵⁵

j. Provide information on past dredging or future planned dredging in the EWOU.

The City did not dredge or arrange to have dredged any part of the East Waterway in association with the Massachusetts Receiving Substation.

k. Provide all documents pertaining to the use, storage, or disposal of any hazardous substances, pollutants, or contaminants at the Subject Property.

Responsive documents have been produced and indexed.

l. Provide all information on electrical equipment used at the Subject Property, including transformers or other electrical equipment that may have contained polychlorinated biphenyls (PCBs).

A 1952 substation plan shows a capacitor pad,⁵⁶ and substation equipment most likely has included capacitors since the City began operating at the site. Substation capacitors contained PCBs until at least 1990.⁵⁷ Records confirming removal of PCB capacitors at Massachusetts Substation have not been located, but PCB capacitors at all City Light facilities were replaced by 1995.⁵⁸

In 1987 two service transformers were found to be contaminated with PCBs, at 951 ppm and 415 ppm.⁵⁹ The service transformers, located on the west end of the

⁵³ SEA EWW_00012273, at SEA EWW_00012398 (126), SCL Hazardous Material Incident report, 2021.

⁵⁴ SEA EWW_00012273, at SEA EWW_00012394 (122), SCL Hazardous Material Incident report, 2021.

⁵⁵ SEA EWW_00012273, at SEA EWW_00012359 (97), SCL Hazardous Material Incident report, 2021.

⁵⁶ SEA EWW_00012499, Contract Plan for Unit Sub Duct Runs, 1952.

⁵⁷ SEA713673, at SEA713683 (11), 1982 Power System Information report; SEA713876, at SEA713883 (8), 1990 Power System Information report.

⁵⁸ Pers. Comm. w/E. Tremaglio, 1/27/2022.

⁵⁹ SEA073875, at SEA073875 (1), PCB Transformer Location Log, 1987.

substation, were scheduled to be retrofilled within the year.⁶⁰ In 1991 a grounding transformer that ruptured contained PCB-contaminated oil.⁶¹ See the response to 1.i.

Most other equipment contained transil or mineral oil. 1967 specifications for the two power transformers to be installed at the substation called for “standard inhibited” (mineral) oil.⁶² Testing in 1985 confirmed that oil in the three power transformers was free of PCBs.⁶³ See also the response to 1.m.

- m. Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances, pollutants, or contaminants which are or were used at the Subject Property.

Electrical equipment at the substation contains transil or mineral insulating oil. The three power or step-down transformers hold approximately nine to ten thousand gallons of oil each.⁶⁴ Other equipment holds hundreds or thousands of gallons of oil.⁶⁵ At times, transil has been stored in the switchgear building shop.⁶⁶

1972 plans and testing correspondence for a cable terminus at the substation show oil-filled 115 kV cable and two four-foot by two-foot oil reservoirs on the property.⁶⁷ Per correspondence, installation required 700 gallons of mineral oil.⁶⁸

Historically, some equipment oil contained PCBs. See the response to 1.i. A few pieces of equipment at the substation use motor oil or diesel.⁶⁹

A 2010 study of City Light facilities that may have used mercury-containing equipment determined that Massachusetts Substation had three thermostats containing a total of approximately two teaspoons of mercury.⁷⁰

- n. Provide any Subject Property drainage descriptions plans or maps that include information about storm drainage which includes, but is not limited to, above or below surface piping, ditches, catch basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to each sanitary sewer.

⁶⁰ SEA073875, at SEA073875 (1), Correspondence re PCB-contaminated transformers, 1987.

⁶¹ SEA150603, at SEA150603 (1), Spill chronology, 1991.

⁶² SEA171736, at SEA171759 (24), Power transformer specifications, 1967.

⁶³ SEA EWW_00011133, at SEA EWW_00011136 (4), Massachusetts Substation equipment list.

⁶⁴ SEA EWW_00011374, at SEA EWW_00011388 (15), Massachusetts Sub SPCC Plan, 2000.

⁶⁵ SEA EWW_00011321, at SEA EWW_00011346 (26), Massachusetts Sub SPCC Plan, 2020.

⁶⁶ SEA EWW_00011374, at SEA EWW_00011391 (18), Massachusetts Sub SPCC Plan, 2000.

⁶⁷ SEA320439, at SEA320441 (3), Planned arrangements for oil-filled cable termination, 1972.

⁶⁸ SEA320687-all, Correspondence and test results re cable oil specifications, 1972.

⁶⁹ SEA EWW_00011374, at SEA EWW_00011389 (16), Massachusetts Sub SPCC Plan, 2000.

⁷⁰ SEA072572, at SEA072573 (2), Summary of mercury issues within SCL, 2010.

Sanitary Drainage

All engineered drainage at the site, both storm and sewer, flows into the city's sanitary sewer system.⁷¹ Sanitary drainage from the site is conveyed north along Utah Avenue South to the metro mainline located below South Royal Brougham Way. The metro mainline flows north to the Seattle Metro Sewage Treatment Plant located at West Point.⁷²

Lined, gravel-filled sumps surround the transformer banks and the four cable pothead terminations. These drain to the oil water separator (OWS) located on the west side of the substation yard.⁷³ The OWS has an oil stop valve, and just downstream of the OWS is a manual shutoff valve.⁷⁴ The OWS drains to the sanitary sewer in Colorado Avenue South.⁷⁵

Discharge pipes from the Control Building connect to the sanitary sewer.⁷⁶ A historic 6-inch sanitary side sewer line on the site was plugged at the property line in 1968.⁷⁷

Storm Drainage

Other than the OWS system described above, there is no engineered storm drain system for the substation yard.⁷⁸ The pipe-type cable pump houses are located over self-contained, concrete sumps.⁷⁹ Stormwater in the remaining yard and equipment areas not connected to the OWS drains directly into the gravel surface and soil below.⁸⁰

- o. With respect to past activities or operations at each Subject Property, provide copies of any stormwater or drainage studies, including data from sampling, conducted at the Subject Property. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during Respondent's occupation of the Subject Property.

Responsive documents have been produced and indexed.

- p. Describe each underground storage tank present at any time on a Subject Property, including but not limited to the size and location of the tank, the materials stored in the tank, the time period of use, whether any material leaked

⁷¹ SEA EWW_00011374, at SEA EWW_00011378 (5), Massachusetts Sub SPCC Plan, 2000.

⁷² SEA EWW_00011374, at SEA EWW_00011378 (5), Massachusetts Sub SPCC Plan, 2000.

⁷³ SEA072574, at SEA072668 (95), Substations Emergency Response Plan, 2007.

⁷⁴ SEA072574, at SEA072668 (95), Substations Emergency Response Plan, 2007.

⁷⁵ SEA072574, at SEA072668 (95), Substations Emergency Response Plan, 2007; SEA EWW_00011029, Oil Containment Plan, 2000.

⁷⁶ SEA EWW_00011374, at SEA EWW_00011403 (30), Massachusetts Sub SPCC Plan, 2000.

⁷⁷ SEA EWW_00010862, Existing Site Plan, 1968; SEA EWW_00019326, Side Sewer Card 3704 front; SEA EWW_00019387, Side Sewer Card 5847 back.

⁷⁸ SEA EWW_00011413, at SEA EWW_00011436 (24), Massachusetts Sub SPCC Plan, 2010.

⁷⁹ SEA EWW_00011413, at SEA EWW_00011432 (20) Massachusetts Sub SPCC Plan, 2010; SEA072574, at SEA072667 (94), Substations Emergency Response Plan, 2007.

⁸⁰ SEA EWW_00011413, at SEA EWW_00011433 (21) Massachusetts Sub SPCC Plan, 2010.

from the tank, the type and quantity of leaked material, and the response to the leaked material.

1972 plans for a cable terminus at the substation show two four-foot by two-foot oil reservoirs to be installed underground on the property.⁸¹ The City has no other records regarding underground storage tanks on the property, and the site is not listed in the Department of Ecology's Regulated UST database.⁸²

- q. Provide the names and last known address of any tenants or lessees, the dates of their tenancy and a description of the activities or operations they conducted while present at the Subject Property.

The City has no information on tenants or lessees at Massachusetts Receiving Substation.

- r. If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:
- i. the U.S. Bankruptcy Court in which the petition was filed;
 - ii. the docket numbers of such petition;
 - iii. the date the bankruptcy petition was filed;
 - iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
 - v. a description of the current status of the petition.

The Respondent, City of Seattle, has not filed for bankruptcy.

- s. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous substances, pollutants, or contaminants, or transportation of hazardous substances, pollutants, or contaminants to or from, the Subject Property.

Echo Tremaglio
Senior Environmental Analyst
Seattle City Light
206-684-3550

⁸¹ SEA320439, at SEA320441 (3), planned arrangements for oil-filled cable termination, 1972.

⁸² Ecology UST database, at [Regulated USTs, Active & Inactive Facilities \(wa.gov\)](https://www.wa.gov), accessed 1/3/2022.